

**UNITED STATES OF AMERICA** : **DATE FILED:** \_\_\_\_\_

**v.** : **CRIMINAL NO.** \_\_\_\_\_

**JOHN COBB** : **VIOLATION : 18 U.S.C. § 1341**  
**(Mail Fraud - 1 count)**

1. At all times material to this information, defendant JOHN COBB lived at 4027 Penn Road, Plymouth Meeting, Pennsylvania, and was the registered owner of a 1996 Volkswagen Jetta, VIN 3VWSA81H3TM051015 (“the 1996 Volkswagen Jetta”).

2. From in or about April 1999 to in or around July 1999, in the Eastern District of Pennsylvania and elsewhere, defendant

devised and intended to devise a scheme to defraud Nationwide Mutual Insurance Company, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of the scheme that:

1. On or about April 13, 1999, Jean Thelemaque, prosecuted elsewhere, offered to sell to an undercover agent a 1996 Volkswagen Jetta, and represented that the owner wanted to dispose of the car to get out of lease/loan payments.

2. On or about April 15, 1999, Jean Thelemaque contacted cooperating witness David Ballek, prosecuted elsewhere, and represented that the vehicle identification number for the 1996 Volkswagen Jetta was VIN 3VWSA81H3TM051015.

3. On or about April 20, 1999, in Philadelphia, defendant JOHN COBB gave to Jean Thelemeque his 1996 Volkswagen Jetta, VIN 3VWSA81H3TM051015.

4. On or about April 20, 1999, in Philadelphia, Jean Thelemaque, gave the undercover agent the 1996 Volkswagen Jetta registered to defendant JOHN COBB, in exchange for \$750.00 in cash.

5. On or about April 21, 1999, at approximately 9:30 p.m., defendant JOHN COBB falsely reported to the Philadelphia Police Department, that his 1996 Volkswagen Jetta had been stolen from the 100 block of Delancey Street in Philadelphia while he was at the movies.

6. On or about April 21, 1999, defendant JOHN COBB falsely reported to insurer Nationwide Mutual Insurance Company (“Nationwide”) in Fort Washington, Pennsylvania, that his 1996 Volkswagen Jetta had been stolen, causing Nationwide to mail various theft claim forms to the defendant.

7. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, having devised and intended to devise the scheme to defraud Nationwide, defendant

**JOHN COBB**

for the purpose of executing this scheme, and attempting to do so, knowingly caused to be

delivered by U. S. mail, according to the directions thereon, a check in the amount of \$11,132.00 from Nationwide Mutual Insurance Co., 414 Commerce Drive, Ft. Washington, Pennsylvania, 19034, to PNC Leasing Corp., 2730 Liberty Avenue, Pittsburgh, Pennsylvania, 15222, representing the outstanding lease balance on the 1996 Volkswagen Jetta.

All in violation of Title 18, United States Code, Section 1341.

---

PATRICK L MEEHAN  
United States Attorney